

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

DEC - 2 2015

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADAM M. REYNOLDS,

Defendant.

No.

4:15CR00535 RLW/NCC

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term

(a) "minor" to mean any person under the age of eighteen years (18 U.S.C. §2256(1));

(b) "sexually explicit conduct" to mean actual or simulated--

(i) sexual intercourse, including genital-genital, anal-genital, oral-genital,
oral-anal, whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C.
§2256(2)(A));

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high
speed data processing device performing logical, arithmetic or storage functions, including any

data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. §2256(6));

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. §2256(8)).

2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about June 22, 2014 and July 12, 2014, within the Eastern District of Missouri and elsewhere,

ADAM M. REYNOLDS,

the defendant herein, did knowingly employ, use, persuade, induce, entice and coerce a minor female, L.M., to engage in sexually explicit conduct, specifically pose and produce an image of herself in a lascivious display of her genitals and pubic area, and defendant acted with the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted in interstate and foreign commerce, and that such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce;

In violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT II

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. Between on or about June 16, 2014, and on or about July 10, 2014, within the Eastern District of Missouri,

ADAM M. REYNOLDS,

the defendant herein, did knowingly attempt to employ, use, persuade, induce, entice and coerce Det. Amy Meyer of the St. Louis County Police Department who defendant believed to be M.O., a minor female, to engage in sexually explicit conduct, that is, to pose and produce images of herself in a lascivious display of her genitals and pubic area, and that such visual depictions were to be produced using materials that were manufactured outside the State of Missouri, and that had been mailed, shipped and transported in interstate and foreign commerce, and that such visual depictions were to be transported and transmitted using any means and facility of interstate and foreign commerce;

In violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT III

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. Between on or about July 10, 2014, and on or about July 16, 2014, within the Eastern District of Missouri and elsewhere,

ADAM M. REYNOLDS,

the defendant herein, knowingly attempted to receive images of child pornography using any means and facility of interstate and foreign commerce, that is the defendant attempted to receive from Det. Amy Meyer of the St. Louis County Police Department who defendant believed to be A.S., a minor female, a visual depiction of A.S. engaged in sexual intercourse;
In violation of Title 18, United States Code, Sections 2252A(a)(2) and (b)(1).

COUNT IV

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.
2. Between on or about June 17, 2014, and on or about July 15, 2014, within the Eastern District of Missouri, and elsewhere,

ADAM M. REYNOLDS,

the defendant herein, did knowingly receive images of child pornography using any means and facility of interstate and foreign commerce, that is, the defendant received graphic image files, via text message, that contained child pornography, including, but not limited to, a file depicting A.M.R., also identified as "Fb Alyssa," a minor female, in a lascivious display of her genitals and pubic area;

In violation of Title 18, United States Code, Sections 2252A(a)(2) and (b)(1).

A TRUE BILL.

FOREPERSON

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